

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

## 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

'AUG 1 0 2004

Wendy Hartmann Moore, Principal Counsel District of Columbia Water and Sewer Authority 5000 Overlook Ave, SW Washington DC 20032

Re: Plan for Encouraging Full Lead Service Line Replacements

Dear Ms. Hartmann Moore,

On August 2, 2004, the U.S. Environmental Protection Agency Region III ("EPA") EPA received documentation from the District of Columbia Water and Sewer Authority ("DCWASA") intended to comply with paragraph 83 of the Administrative Order for Compliance on Consent (SDWA 03-2004-0259-DS) ("Order"). Paragraph 83 directs DCWASA to submit for EPA's review and approval a plan to encourage homeowner consent to full replacement of lead service lines.

EPA approves of the plan submitted by WASA on August 2, 2004, in accordance with Paragraph 83. We commend DCWASA's efforts to work with contractors, financial institutions and the District of Columbia Department of Health to identify a variety of options for homeowners to pay for full replacement of lead service lines on the private portion. We believe that full replacement is the most protective of human health and believe these options will improve the percentage of residents taking advantage of full replacement of their lead service lines. In the plan, DCWASA indicates that a flyer for the DCDH program will be included in a package that is sent to customers. Availability of the other financing options should be included as well.

We suggest that the annual report of the service line replacement program include a break down of the response to the various options in order to measure success of the options provided. Due to privacy issues there is no need to include a break down by address, but a tabulation of the numbers of lines replaced using each funding mechanism would be a valuable measure to show the success of each. In addition, EPA suggests that DCWASA employ some of the mechanisms

and organizational relationships developing under the Public Education plan to gather some feedback from the community on the utility of each financial option.

If you have any questions, please contact me at 215-814-5445.

Sincerely,

Karen D. Johnson, Chief

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Safe Drinking Water Act Branch

cc: John T. Dunn, DCWASA